## Exhibit E

**Estimated Staffing and Budget Plan** 

## STAFFING PLAN FOR SULLIVAN & CROMWELL LLP, COUNSEL TO THE DEBTORS AND DEBTORS-IN-POSSESSION, FOR THE PERIOD NOVEMBER 11, 2022 THROUGH JANUARY 31, 2023

TIMEKEEPER CATEGORY	NUMBER OF TIMEKEEPERS EXPECTED TO WORK ON THE MATTER DURING THE APPLICATION PERIOD (1)	RANGE OF RATES	
Partners	60	\$1,595-\$2,165	
Associates	150	\$550-\$1,475	
Non-Legal Personnel	70	\$425-\$595	

<sup>(1)</sup> Estimate is for total number of timekeepers billing any substantial number of hours to matter (not F.T.E.s).

<sup>(2)</sup> Includes clerks, legal analysts and eDiscovery professionals.

## ESTIMATED BUDGET FOR SULLIVAN & CROMWELL, COUNSEL TO THE DEBTORS AND DEBTORS-IN-POSSESSION, FOR THE PERIOD NOVEMBER 11, 2022 THROUGH JANUARY 31, 2023

WORKSTREAM <sup>1</sup>	ESTIMATED FEES <sup>2</sup>	PROJECT CATEGORY	HOURS BILLED	FEES SOUGHT
ASSET ANALYSIS &				
RECOVERY; CYBER HACK		ASSET ANALYSIS AND		
RESPONSE; CRYPTO TRACING	\$5,250,000	RECOVERY	2,635.00	\$4,370,364.50
M&A	\$5,000,000	ASSET DISPOSITION	4,338.10	\$5,605,205.50
		ASSUMPTION AND REJECTION		
CONTRACTS AND LEASES	\$400,000	OF LEASES AND CONTRACTS	251.30	\$285,361.50
AVOIDANCE ACTIONS	\$1,500,000	AVOIDANCE ACTION ANALYSIS	388.80	\$620,300.50
DISCOVERY REQUESTS AND		GENERAL REGULATORY	969.40	\$1,423,486.50
DISPUTES; PREPETITION		DISCOVERY	8,728.80	\$7,054,910.00
INVESTIGATIONS;				
REGULATORY;				
CONGRESSIONAL TESTIMONY	\$21,000,000	GENERAL INVESTIGATION	4,003.70	\$5,828,378.50
		CLAIMS ADMINISTRATION AND		
CLAIMS ADMINISTRATION		OBJECTIONS	0.30	\$232.50
AND INVESTIGATION	\$600,000	CLAIMS INVESTIGATION	53.10	\$80,244.00
BOARD/ CORPORATE		CORPORATE GOVERNANCE		
GOVERNANCE	\$800,000	AND BOARD MATTERS	1,335.40	\$1,920,415.00
		BUSINESS OPERATIONS	387.00	\$510,661.00
BUSINESS OPERATIONS/		EMPLOYEE BENEFITS AND		
EMPLOYEE MATTERS	\$600,000	PENSIONS	213.10	\$273,555.50

Budget was created at the commencement of these Chapter 11 Cases based on anticipated workstreams when not all project codes were created. Additional project codes were later created as specific workstreams were identified.

Estimated fees represent high-end of S&C's estimates of fees during the interim fee period.

WORKSTREAM <sup>1</sup>	ESTIMATED FEES <sup>2</sup>	PROJECT CATEGORY	HOURS BILLED	FEES SOUGHT
		EMPLOYMENT AND FEE		
		APPLICATIONS (S&C)	647.10	\$939,307.00
		EMPLOYMENT AND FEE		
RETENTIONS	\$3,000,000	APPLICATIONS (OTHERS)	366.70	\$481,581.00
FINANCING AND CASH		FINANCING AND CASH		
COLLATERAL	\$0	COLLATERAL	25.10	\$44,702.50
		OTHER LITIGATION	626.20	\$917,907.50
OTHER LITIGATION AND		OTHER		
MOTIONS	\$1,000,000	MOTIONS/APPLICATIONS	405.40	\$593,125.50
MEETINGS AND		MEETINGS AND		
COMMUNICATIONS WITH		COMMUNICATIONS WITH		
CREDITORS	\$1,000,000	CREDITORS	404.50	\$707,960.50
PLAN AND DISCLOSURE		PLAN AND DISCLOSURE		
STATEMENT	\$0.00	STATEMENT	2.20	\$2,112.00
	44.000.000	RELIEF FROM STAY AND		******
STAY RELIEF		ADEQUATE PROTECTION	51.60	\$84,211.50
TAX	\$1,500,000	TAX	306.60	\$584,706.00
VALUATION	\$0	VALUATION	-	\$0.00
HEARINGS	\$900,000	HEARINGS	116.30	\$228,088.00
		FIRST AND SECOND DAY		
FIRST AND SECOND DAYS	\$3,000,000	MOTIONS	1,918.20	\$2,676,061.50
SCHEDULES, SOFAS AND		SCHEDULES, SOFAS AND		
REPORTING	\$400,000	REPORTING	14.40	\$25,398.50
		CASE ADMINISTRATION	417.10	\$707,157.00
		TIME ENTRY REVIEW	1,323.60	\$0.00
		BUDGETING	12.60	\$24,907.00
CASE ADMINISTRATION	\$1,500,000	NON-WORKING TRAVEL	111.20	\$104,963.80
BAHAMAS	\$3,000,000	BAHAMAS MATTERS	963.60	\$1,522,017.00

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WORKSTREAM <sup>1</sup>	ESTIMATED FEES <sup>2</sup>	PROJECT CATEGORY	HOURS BILLED	FEES SOUGHT
		FOREIGN DEBTOR MATTERS	1,358.50	\$2,191,633.50
		COORDINATION WITH		
JAPAN/AUSTRALIA/ ROW	\$2,800,000	FOREIGN PROCEEDINGS	259.40	\$481,557.00
		COORDINATION IN OTHER		
OTHER BANKRUPTCIES	\$1,000,000	BANKRUPTCIES	1,163.20	\$1,501,798.00
TOTAL	\$55,250,000		33,797.50	\$41,792,309.80